

WEIL, GOTSHAL & MANGES LLP
Stephen Karotkin (*pro hac vice*)
(stephen.karotkin@weil.com)
Ray C. Schrock, P.C. (*pro hac vice*)
(ray.schrock@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
New York, NY 10153-0119
Tel: (212) 310-8000
Fax: (212) 310-8007

KELLER & BENVENUTTI LLP
Tobias S. Keller (#151445)
(tkeller@kellerbenvenutti.com)
Jane Kim (#298192)
(jkim@kellerbenvenutti.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: (415) 496-6723
Fax: (415) 636-9251

Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- Affects PG&E Corporation
 - Affects Pacific Gas and Electric Company
 - Affects both Debtors

* All papers shall be filed in the lead case,
No. 19-30088 (DM)

Bankruptcy Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**SECOND STIPULATION BETWEEN THE
DEBTORS AND THE OFFICIAL
COMMITTEE OF TORT CLAIMANTS
EXTENDING TIME TO RESPOND TO
THE TORT CLAIMANTS
COMMITTEE'S MOTION TO EXTEND
THE BAR DATE**

Re: Dkt. No. 4292

[No Hearing Requested]

This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and debtors in possession (collectively, the “**Debtors**”), on the one hand, and the Official Committee of Tort Claimants (“**Tort Claimants Committee**”), on the other hand. The Debtors and the Tort Claimants Committee are referred to in this Stipulation and Agreement for Order collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

RECITALS

A. On October 18, 2019, the Tort Claimants Committee filed the *Motion of the Official Committee of Tort Claimants Pursuant to 11 U.S.C. §§ 105 and 501 and Fed. R. Bankr. P. 3003(c) for Entry of an Order Extending the Bar Date* [Dkt. No. 4292] (the “**TCC Bar Date Extension Motion**”), which is set for a hearing before the Court at 10:00 a.m. on November 13, 2019. Any response or opposition to the TCC Bar Date Extension Motion was due by 4:00 p.m. (Pacific Time) on November 6, 2019.

B. The Parties previously entered into the *Stipulation Between the Debtors and the Tort Claimants Committee Extending Time to Respond to the Tort Claimants Committee’s Motion to Extend the Bar Date* (“**First Stipulation**”), filed on November 4, 2019 [Docket No. 4565], requesting that the time for the Debtors to respond to the TCC Bar Date Extension Motion be extended to 4:00 p.m. (Pacific Time) on November 8, 2019. An order approving the First Stipulation was entered on November 6, 2019 [Docket No. 4585].

C. Counsel for the Debtors has requested, and counsel for the Tort Claimants Committee has agreed, that the time for Debtors to respond to the TCC Bar Date Extension Motion be further extended.

NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER, THAT:

1 1. The time for the Debtors to file and serve any response or opposition to the TCC
2 Bar Date Extension Motion is extended through 4:00 p.m. (Pacific Time) on November 11, 2019.
3

4 Dated: November 8, 2019

5 WEIL, GOTSHAL & MANGES LLP
6 KELLER & BENVENUTTI LLP

7 /s/ Thomas B. Rupp

8 Thomas B. Rupp

9 *Attorneys for Debtors
and Debtors in Possession*

Dated: November 8, 2019

BAKER HOSTETLER LLP

7 /s/ David J. Richardson

8 David J. Richardson

9 *Attorneys for Official Committee of Tort
Claimants*

Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153-0119